

From: [Walters, Donn](#)
To: [Miller, Garyg](#)
Subject: RE: PRP Address List
Date: Tuesday, August 12, 2014 2:54:27 PM

Ok, thanks. I forwarded List to our contractor to review.

From: Miller, Garyg
Sent: Tuesday, August 12, 2014 1:04 PM
To: Walters, Donn
Subject: FW: PRP Address List

Donn,

Here is the current list of Gulfco PRPs.

Thanks,

Gary Miller
EPA Remedial Project Manager
214-665-8318
miller.garyg@epa.gov

From: Foster, Anne
Sent: Tuesday, August 12, 2014 12:28 PM
To: Miller, Garyg
Cc: Andrews, Lawrence
Subject: PRP Address List

This is a list of current parties that have received notice letters, including the newer/non-UAO parties. I think it would be the correct list for Donn to use for the ESD.

From: Andrews, Lawrence
Sent: Monday, June 23, 2014 7:55 AM
To: McLane, Bradford (ENRD); Foster, Anne
Cc: Donnellan, Michael (ENRD); McIlwain, David (ENRD)
Subject: RE: Gulfco Tolling Agreement

Here is the list we out together.

From: McLane, Bradford (ENRD) [<mailto:Bradford.McLane@usdoj.gov>]
Sent: Friday, June 20, 2014 4:11 PM
To: Andrews, Lawrence; Foster, Anne
Cc: Donnellan, Michael (ENRD); McIlwain, David (ENRD)
Subject: RE: Gulfco Tolling Agreement

****attorney client privileged****

Thanks Lawrence,

Depending on what we decide next week, and subject to review by my management here, I don't see a need to amend the EPA notice letter. I think that the notice letter should go out as is, together with the draft consent decree.

I am thinking that we at DOJ will separately send out letters by mail and email to PRPs next week, together with the tolling agreement. In our letter, we will indicate that EPA will soon be following up with a special notice letter, and that in the interim, we ask that the parties enter into a tolling agreement to facilitate the settlement discussions that we hope will soon follow their receipt of the special notice letters.

To that end, can you send me the contact information that you have for all of the PRPs (including addresses, phones, and email addresses)?

The idea is to get the tolling agreements signed quickly. My preliminary interactions with counsel for Dow and Sequa/Chromalloy suggests that we will not have difficulty getting these entities to sign a tolling agreement. The question is whether the other entities will be similarly willing to enter into such an agreement.

Sincerely,

Brad

Bradford McLane
Trial Attorney
Environmental Enforcement Section
Environment & Natural Resources Division
United States Department of Justice
Regular mail: PO Box 7611, Washington, DC 20044-7611
Overnight mail: 601 D Street N.W., Washington, DC 20004
Phone: (202) 305-0544
Facsimile: (202) 616-6584

From: Andrews, Lawrence [<mailto:andrews.lawrence@epa.gov>]
Sent: Friday, June 20, 2014 11:56 AM
To: McLane, Bradford (ENRD); Foster, Anne
Cc: Donnellan, Michael (ENRD); McIlwain, David (ENRD)
Subject: RE: Gulfco Tolling Agreement

Thanks for you help.

From: McLane, Bradford (ENRD) [<mailto:Bradford.McLane@usdoj.gov>]
Sent: Friday, June 20, 2014 10:40 AM
To: Andrews, Lawrence; Foster, Anne
Cc: Donnellan, Michael (ENRD); McIlwain, David (ENRD)
Subject: RE: Gulfco Tolling Agreement

Certainly. I believe that I only have a PDF version of the notice letter. Could you send me a copy in word format?

From: Andrews, Lawrence [<mailto:andrews.lawrence@epa.gov>]
Sent: Friday, June 20, 2014 11:35 AM
To: McLane, Bradford (ENRD); Foster, Anne
Cc: Donnellan, Michael (ENRD); McIlwain, David (ENRD)
Subject: RE: Gulfco Tolling Agreement

Do you have any suggested language we should use in the notice letter. Thanks.

From: McLane, Bradford (ENRD) [<mailto:Bradford.McLane@usdoj.gov>]
Sent: Friday, June 20, 2014 10:28 AM
To: Foster, Anne
Cc: Donnellan, Michael (ENRD); McIlwain, David (ENRD); Andrews, Lawrence
Subject: Gulfco Tolling Agreement

Anne,

Attached is a draft tolling agreement to go out with the special notice letter. The primary thing that I need for you to do is review the first paragraph and make sure that we are correctly identifying all of the PRPs in the agreement. As you know, there are a lot of complex corporate structures and changes over time that make it challenging to identify and correctly name all of the PRPs. I have tried to name all of the PRPs based on the information contained in the referral, Dave McIlwain's helpful research, and basic internet searches. Hopefully we can connect by phone soon and walk through the different PRPs.

I am in next week Monday and Tuesday and out at a training in Columbia SC Wednesday through Friday morning. If you have some time let's connect on Monday or Tuesday.

We will follow up shortly respecting the revised Consent Decree that you emailed over last week.

Thanks,

Brad

Bradford McLane
Trial Attorney
Environmental Enforcement Section

Environment & Natural Resources Division

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